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Attorneys for Plaintiff RAINBOW S.p.A.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RAINBOW S.p.A.,

Plaintiff

v.

SECRET WATERFALL LLC,
LAUNCELOT A. DEVAULT, TARAH
A. UHRICH, STARLINE MEDIA, INC.,
AND DAVID NDALAMBA,

Defendants.

Case No. 5:25-cv-00597-MRA-DTB

**STIPULATED JOINT SECOND
REQUEST TO EXTEND THE
DEADLINE FOR DEFENDANTS
SECRET WATERFALL LLC,
LAUNCELOT A. DEVAULT, AND
TARAH A. UHRICH TO RESPOND
TO PLAINTIFF'S SECOND
AMENDED COMPLAINT AND
DECLARATION OF BRADFORD G.
HUGHES**

[Filed concurrently with Proposed order]

Plaintiff Rainbow S.p.A. ("Plaintiff") and defendants Secret Waterfall LLC, Launcelot A. Devault and Tarah A. Uhrich (collectively referred to herein as "Secret Defendants"), collectively with the Secret Defendants ("Parties"), through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its initial Complaint in this copyright matter on March 5, 2025 (ECF No. 1);

WHEREAS, on March 24, 2025, before Plaintiff served any party with the initial Complaint, Plaintiff filed a First Amended Complaint (ECF No. 11);

1 WHEREAS, on April 25, 2025, Plaintiff effectuated service of the First
2 Amended Complaint on the Secret Defendants pursuant to Notices of
3 Acknowledgment of Receipt of Summons and Complaint;

4 WHEREAS, on May 27, 2025, the Parties filed a Stipulated Joint First
5 Request to Extend the Deadline for Defendants to Respond to Plaintiff's First
6 Amended Complaint which sought an extension of time for the Secret Defendants
7 to respond so that Plaintiff could file a Second Amended Complaint (ECF No. 14)
8 ("First Request to Extend");

9 WHEREAS, on May 30, 2025, the Court granted the Parties First Request to
10 Extend, which extended the deadline for the Secret Defendants to Respond to July
11 2, 2025 (ECF No. 15);

12 WHEREAS, on June 25, 2025, Plaintiff filed a Motion for Leave to Amend
13 and file a Second Amended Complaint (ECF No. 17);

14 WHEREAS, on August 6, 2025, the Court granted Plaintiff's Motion for
15 Leave to Amend and file a Second Amended Complaint (ECF No. 23);

16 WHEREAS in the Court's Order granting Plaintiff's Motion for Leave to
17 Amend and file a Second Amended Complaint, the Court ordered that Defendants'
18 response to Plaintiff's Second Amended Complaint would be due 45 days from the
19 date Plaintiff filed its Second Amended Complaint (*id.*);

20 WHEREAS, Plaintiff filed its Second Amended Complaint on August 11,
21 2025 (ECF No. 25), making Defendants' response to Plaintiff's Second Amended
22 Complaint due on September 25, 2025;

23 WHEREAS, on September 18, 2025, the Parties' counsel held a conference
24 of counsel pursuant to Local Rule 7-3 to discuss the Secret Defendants' intent to
25 file a motion to dismiss the Second Amended Complaint;

26 WHEREAS, the parties agree that good cause exists to extend the deadline
27 for the Rainbow Defendants to respond to the Second Amended Complaint in
28 order to enable Plaintiff to adequately evaluate the issues raised by the Secret

1 Defendants and decide whether to seek to file a Third Amended Complaint;

2 WHEREAS, the case is not yet at issue, as Plaintiff has not yet served all of
3 the defendants named in this action with the Second Amended Complaint;

4 WHEREAS, the Parties agree that a 30 day extension for the Secret
5 Defendants to Respond to Plaintiff's Second Amended Complaint is a reasonable
6 extension in view of the expected time it will take for Plaintiff to decide whether it
7 will seek to file a Motion for Leave to file a Third Amended Complaint and to file
8 the same;

9 WHEREAS, as explained above, the parties have previously sought and
10 received an extensions of time for the Secret Defendants to respond to Plaintiff's
11 opening pleadings in order to address and resolve issues relating to the pleadings
12 between the parties, and to limit the scope of issues brought before the Court in a
13 motion to dismiss;

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
2 between the Parties and their undersigned counsel, that the Parties hereby jointly
3 request that this Court conclude that good cause exists to extend the deadline for
4 the Secret Defendants to respond to Plaintiff's Second Amended Complaint, and
5 that the Secret Defendants have up to and including October 27, 2025 to answer,
6 move, or otherwise respond to Plaintiff's Second Amended Complaint in this
7 action.

8 Dated: September 22, 2025

CLARK HILL LLP

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10 By: /s/ Bradford G. Hughes

11 Bradford G. Hughes

12 Attorneys for Plaintiff RAINBOW S.p.A.

13
14 Dated: September 22, 2025

BERGESON, LLP

15
16 By: Jaideep Venkatesan

17 Jaideep Venkatesan

18 Attorneys for Defendants

19 SECRET WATERFALL LLC,

20 LAUNCELOT A. DEVAULT, AND TARAH

A. UHRICH

21 **ATTESTATION**

22 I, Bradford G. Hughes, hereby attest, pursuant to C.D. Cal. Civil Local Rule
23 5-4.3.4(a)(2)(i), that concurrence to the filing of this document has been obtained
24 from each signatory.

25 /s/ Bradford G. Hughes

26 Bradford G. Hughes

DECLARATION OF BRADFORD G. HUGHES

I, Bradford G. Hughes, declare as follows:

1. I am an attorney at law, duly licensed to practice before the courts of the State of California. I am a Partner with the law firm of Clark Hill LLP, attorneys of record for Plaintiff RAINBOW S.p.A. in the above-referenced matter.

2. I submit this Declaration in support of Stipulated Joint Second Request to Extend the Deadline for Defendants Secret Waterfall LLC, Launcelot A. Devault and Tarah A. Uhrich to Respond to Plaintiff's Second Amended Complaint.

3. I have personal knowledge of the facts set forth herein and if called testify could and would competently testify thereto.

4. On September 18, 2025, the Parties' counsel held a conference of counsel pursuant to Local Rule 7-3 to discuss the Secret Defendants' intent to file a motion to dismiss the Second Amended Complaint

5. The Parties agree that a 30 day extension for the Secret Defendants to Respond to Plaintiff's Second Amended Complaint is a reasonable extension in view of the expected time it will take for Plaintiff to decide whether it will seek to file a Motion for Leave to file a Third Amended Complaint and to file the same.

6. The case is not yet at issue. Plaintiff has been attempting to serve the defendants who have not yet appeared with the Second Amended Complaint.

Executed on this 22nd day of September, 2025 in Los Angeles, California.

/s/ Bradford G. Hughes
Bradford G. Hughes

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of LOS ANGELES, State of California. I am over the age of 18 and not a party to the within action; my business address is 555 South Flower Street, 24th Floor, Los Angeles, California 90071.

On September 22, 2025, I served the foregoing document(s) described as:

STIPULATED JOINT FIRST REQUEST TO EXTEND THE DEADLINE FOR DEFENDANTS SECRET WATERFALL LLC, LAUNCELOT A. DEVAULT, AND TARAH A. UHRICH TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT AND DECLARATION OF BRADFORD G. HUGHES

on the parties in this action:

☒ VIA CM/ECF: I electronically filed the foregoing document with the Clerk of Court by using the Court's CM/ECF system and the registered CM/ECF users will be served electronically by the CM/ECF system

Executed on September 22, 2025, at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

MELISSA DE LOS REYES
MELISSA DE LOS REYES